

COMPLIANCE EVALUATION INSPECTION REPORT

Date of Inspection: May 26, 2011

Facility: Schlumberger (formerly Dowell Schlumberger)
1170 East Main
Vernal, Utah, 84078

Facility Contacts: Selwyn Simpler
John Bruch

Notification: SQG

EPA ID Number: UTD⁹2026657

Applicable Regulations: R315-5

Type of Inspection: CEI

Weather Conditions: Sunny, 75 degrees

Time of Arrival: 1:30 p.m.

Time of Departure: 3:00 pm

Team Members: Alex Pashley (DSHW)
Rocky Stonestreet (DSHW)

Report Prepared By: Alex Pashley

Facility Description:

Schlumberger is an oil field service company. The Vernal office currently has 11 employees, down from 205 from a couple of years ago. Schlumberger currently generates conditionally exempt small quantity amounts of hazardous waste, but wants to remain on the RCRA list as a small quantity generator. Dowell Schlumberger names is now just Schlumberger with out the Dowell.

Schlumberger has one Safety Kleen parts washer which is rarely ever changed out, and a 165 gallon tank of HCL that is used to clean out tanker trucks once in a while. The acid is reused over and over until spent. It is changed out about once a year. No problems were noted during the inspection. All manifest and other records were in good condition (see

check lists). A notification form was left for them to change their name after consulting with their corporate office.

R315-5 Hazardous Waste Generator Requirements

5-1.11 Determination of Whether a Waste is a Hazardous Waste OK

5-1.12 Identification Numbers UTD92026657

5-2.20 Manifest OK

5-3.30 Packaging, Labeling, Marking, and Placarding OK

5-3.34.1 Accumulation Time OK

Container Management

Preparedness and Prevention OK

5-4.40 Recordkeeping OK

5-4.42 Exception Reporting N/A

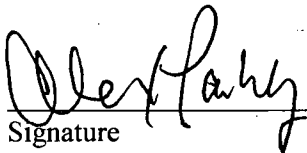
5-4.43.1 Additional Reporting N/A

R315-13-1 Land Disposal Restrictions

13-1 Land Disposal Restrictions OK

R315-16 Standards for Universal Waste

R315-9 Spill Response OK


Signature

6-6-2011
Date

Site: Dowell Schlumberger

ID#: _____

Date: 5-26-11

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Manifest Number (box)	# <u>00293834</u>	# <u>001125293</u>
Generator EPA ID #	<u>ok</u>	<u>ok</u>
R315-5-2 (box 1)	<u>ok</u>	<u>ok</u>
Generator information:		
Mailing Address (box 5)	<u>ok</u>	<u>ok</u>
Phone number	<u>ok</u>	<u>ok</u>
Transporter #1 information:		
Company Name (box 6)	<u>ok</u>	<u>ok</u>
EPA ID# (box 6)	<u>ok</u>	<u>ok</u>
Transporter #2 information:		
Company Name (box 7)	<u>ok</u>	<u>ok</u>
EPA ID # (box 7)	<u>ok</u>	<u>ok</u>
Designated Facility information:		
Name and Address (box 8)	<u>ok</u>	<u>ok</u>
EPA ID # (box 8)	<u>ok</u>	<u>ok</u>
Phone Number (box 8)	<u>ok</u>	<u>ok</u>
Waste shipping requirements:		
DOT Description (including proper name, Hazard class and ID#)	<u>ok</u>	<u>ok</u>
(box 9b)	<u>↓</u>	<u>↓</u>
(box 9a "X" if hazardous materials)	<u>↓</u>	<u>↓</u>
Containers: No & Type (box 10)	<u>↓</u>	<u>↓</u>
Total Quantity (box 11)	<u>↓</u>	<u>↓</u>
Unit – Wt/Vol (box 12)	<u>↓</u>	<u>↓</u>
Waste Codes (box 13)	<u>ok</u>	<u>ok</u>
Special Handling Instructions (box 14)	<u>ok</u>	<u>ok</u>
Manifest Certifications:		
Generator's Signature (box 15)	<u>ok</u>	<u>ok</u>
International Shipments (box 16)	<u>ok</u>	<u>ok</u>
Transporter's Signature (box 17)	<u>ok</u>	<u>ok</u>
Discrepancy Indication (box 18)	<u>ok</u>	<u>ok</u>
Hazardous Waste Report Management Method Codes (box 19)		
Facility Signature (box 20)		
Final Observations and Comments:	<u>No concerns</u>	<u>No concerns</u>

Inspector's Initials: RLS

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Date: 5-26-2011**Hazardous Waste Inspection – Small Quantity Generator Checklist**

INSPECTION ITEM	CITATION	COMMENTS
<u>Waste Determination:</u> Has the generator determined whether his solid waste is a hazardous waste?	R315-5-1.11 262.11	OK
Has a waste determination been made for each waste stream?	R315-2-3 262.3	OK
<u>Notification and EPA Hazardous Waste Identification Numbers</u> Has the generator notified of regulated activity and obtained an EPA ID#?	R315-5-1.12 262.12	OK
Has the generator offered his hazardous waste to a transporter or a treatment, storage, or disposal facility (TSDF) that does not have an EPA ID#?	R315-5-1.12 262.12	OK
<u>Manifest</u> Has the generator used the approved manifest form 8700-22 and 8700-22A for off-site transportation to a TSDF?	R315-5-2.20 (a) 262.20(a)	OK
Have all applicable sections of each manifest been filled out completely and legibly? (See attached manifest checklist)	R315-5-2	OK
Does the facility generate less than 1000 kg/month and use a contractual agreement to reclaim his waste?	R-315-5-2.20(e)(1) 262.20(e)	N/A
Have copies of the reclamation agreements been kept on file for at least three years after termination of the agreement?	R-315-5-2.20(e)(2) 262.20(e)	OK
<u>Record Keeping</u> Is the generator maintaining signed copies of the manifests for three years?	R-315-5-4.40(a) 262.40(a)	OK
Is the generator maintaining records of test results or waste analyses for hazardous waste determinations for at least three years?	R-315-5-4.40(c) 262.40(c)	OK
<u>Exception Reporting</u> Has the generator been required to prepare an Exception Report (if the TSDF does not return the generator's original copy of the manifest within 60 days)? If yes, the generator must submit a legible copy of the manifest to the Executive Secretary, with some indication that the confirmation of delivery to the TSDF has not been received.	R315-5-4.42(b) 262.42(b)	OK
Has the generator kept a copy of each Exception Report for at least three years?	R315-5-4.40(b) 262.40(b)	OK

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Date: 5-26-2010**Hazardous Waste Inspection – Small Quantity Generator Checklist**

INSPECTION ITEM	CITATION	COMMENTS
<u>Packaging, Labeling, Marking, and Placarding</u> Are hazardous waste containers packaged, labeled, marked, and placarded in accordance with DOT 49 CFR prior to shipment?	R315-5-3 262.30, 262.31, 262.32, & 262.33	OK
<u>Accumulation Time</u> Has the generator stored hazardous wastes on-site for longer than 180 days or 270 days (if the wastes are transported over 200 miles to a TSDF) without a permit?	R315-5-3.34 262.34(d) & 262.34(e)	OK
Has the generator ever accumulated more than 6000 kg of hazardous waste on-site?	R315-5-3.34 262.34(d)(1)	OK
The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container of hazardous waste.	R315-5-3.34 262.34(d)(4) 262.34(a)(2)	OK
While being accumulated on-site each container and tank is labeled or marked clearly with the words, "Hazardous Waste".	R315-5-3.34 262.34(d)(4) 262.34(a)(3)	OK
Does the facility have at least one person on the premises or on call (available to reach the facility in a short period of time) with the responsibility for coordinating all emergency response measures. This employee is the emergency coordinator.	R315-5-3.34 262.34(d)(5) 262.34(d)(5)(i)	OK
Has the generator posted the following information next to the telephone: Name and phone number of emergency coordinator; Location of fire extinguishers, spill control material, and if present, fire alarm; and Telephone number of the fire department, unless the facility has a direct alarm.	R315-5-3.34 262.34(d)(5) 262.34(d)(5)(ii)	OK
Does the generator ensure that all employees are thoroughly familiar with the hazardous waste handling and emergency procedures relevant to their positions?	R315-5-3.34 262.34(d)(5) 262.34(d)(5)(iii)	OK
Will the Emergency Coordinator or his designee be available to respond to any emergencies that arise: Applicable responses are specified in 262.34(d)(5)(iv)	R315-5-3.34 262.34(d)(5) 262.34(d)(5)(iv)	OK
<u>Use and Management of Containers</u> Are hazardous waste containers in good condition?	R315-5-3.34 262.34(d)(2) 265.171	OK

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Date: 5-26-2011**Hazardous Waste Inspection – Small Quantity Generator Checklist**

INSPECTION ITEM	CITATION	COMMENTS
Are the containers compatible with the hazardous waste?	262.34(d)(2) 265.172	OK
Are hazardous waste containers must be kept closed except when adding or removing waste.	262.34(d)(2) 265.173(a)	OK
Are containers must not be opened, stored or handled in a way that may cause them to rupture or leak hazardous waste.	262.34(d)(2) 265.173(b)	OK
Hazardous waste containers must be inspected weekly looking for unlabeled, leaking and deteriorated containers.	262.34(d)(2) 265.174	OK
Are incompatible wastes must not be stored in the same containers.	262.34(d)(2) 265.177(a)	OK
Are hazardous wastes placed in containers that previously held an incompatible waste?	262.34(d)(2) 265.177(b)	OK
Are incompatible hazardous wastes containers separated from incompatible wastes by means of a dike, berm, wall, or other device?	262.34(d)(2) 265.177(c)	OK
<u>Preparedness and Prevention</u>		
Is the facility maintained and operated in a way to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste.	R315-5-3.34 262.34(d)(4) 265.31	OK
Does the facility have the following equipment unless the wastes stored do not pose the hazards that the equipment is designed to respond to: internal communications or alarm capable of providing immediate emergency instructions (voice or signal) to facility personnel, a device capable of summoning outside emergency equipment (such as a telephone or a direct line to the fire department), portable fire extinguishers, fire control equipment, spill control equipment, decontamination equipment, water at adequate pressure and volume to supply fire fighting needs.	262.34(d)(4) 265.32	OK
Does the facility must maintain and test, where necessary, all communications or alarm systems; fire protection equipment, spill control equipment, and decontamination equipment to assure proper operation when needed.	262.34(d)(4) 265.33	OK

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Site: Schlumberger

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Date: 5-20-2009**Hazardous Waste Inspection – Small Quantity Generator Checklist**

INSPECTION ITEM	CITATION	COMMENTS
Do facility personnel have immediate access to an alarm or emergency communication device whenever hazardous waste is handled and if there is ever just one employee on the premises during facility operation, does he have immediate access to a device (telephone or two-way radio) capable of summoning external emergency assistance?	262.34(d)(4) 265.34	ok
Does the facility maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?	262.34(d)(4) 265.35	GK
Has the facility attempted to make arrangements with local fire, police, emergency response teams, and hospitals to respond to emergency situations? The facility must document any refusal to enter into such arrangements.	262.34(d)(4) 265.37	
<u>Spill Response</u> Take appropriate action to minimize threats to human health and the environment by notifying the Utah Department of Environmental Quality at (801) 536-4123 if more than 1 kg of acutely hazardous waste, 100 kg of hazardous waste or material which when spilled becomes a hazardous waste, or 25 gallons of used oil. Provide information as required.	R315-9 R315-9-1	✓ Fine city county next hospital.
Notify and report to the National Response Center, at 800-424-8802, if required.	R315-9-1.1	
Provide a written report including all information required in R315-9-4 to the Executive Secretary within 15 days after any spill of hazardous waste or material which becomes a hazardous waste when spilled and is reported under R315-9-1.	R315-9-4	ok
<u>Land Disposal Restrictions (LDR)</u> Is the facility managing and treating hazardous waste to meet Land Disposal Restriction standards found at 268.40. The generator must also develop and follow a written waste analysis plan which describes the procedures they will carry out to comply with the treatment standards. The waste analysis plan must be based on a chemical and physical analysis of a representative sample of the waste being treated. Such plans must be kept in the facility's on-site files and available to inspectors. Wastes shipped off-site pursuant to this paragraph must comply with the notification requirements of 268.7(a)(3).	R315-13-1 262.34(d)(4) 268.7(a)(5)	GK

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Date: 5-22-2017**Hazardous Waste Inspection – Small Quantity Generator Checklist**

INSPECTION ITEM	CITATION	COMMENTS
If the hazardous waste meets the treatment standard at the original point of generation, with each initial shipment of waste or if the waste changes, the generator must send a one-time written notice to each treatment, storage, or disposal facility receiving the waste, and keep a copy in the file. The notice must include the information included in column "268.7(a)(3)" in the Table in 268.7(a)(4).	262.34(d)(4) 268.7(a)(5) 268.7(a)(3)	oh
Does the facility maintain an assessment of LDR status on file for each hazardous waste generated at the facility	R315-13-1 268.7(a)	oh
A notice and certification that each hazardous waste is either not land disposal restricted, or if it is restricted, that it is land disposable after treatment, must accompany the original manifested shipment of hazardous waste or when the waste stream changes.	R315-13-1 268.7(a)	oh
Maintain all LDR documentation for at least three years from the date the hazardous waste was shipped off-site.	R315-13-1 268.7(a)(8)	oh
<u>Standards for Universal Waste Management</u> High mercury containing lamps must be recycled or disposed of as hazardous waste. Any broken lamps must be disposed of as a hazardous waste. Do not dispose of high mercury containing lamps in the regular trash or dumpster.	R315-16 R315-16-2	
Container of mercury containing lamps must be closed and labeled "Universal Waste Lamps", "Waste Lamps", or "Used Lamps".	R315-16-2	oh
Universal waste lamps should not be accumulated for longer than one year.	R315-16-2	oh
Are rechargeable batteries recycled or managed as a hazardous waste, kept in a closed container labeled "Universal Waste Batteries", and not accumulated for longer than one year.	R315-16-2	oh

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